

# JacksonLewis

DIRECT DIAL: (248) 936-1930  
 EMAIL ADDRESS: [ALLAN.RUBIN@JACKSONLEWIS.COM](mailto:ALLAN.RUBIN@JACKSONLEWIS.COM)

## VIA ECF

The Honorable Philip M. Halpern  
 Hon. Charles L. Brieant Jr.  
 Federal Building and Courthouse  
 300 Quarropas Street  
 White Plains, New York 10601

Jackson Lewis P.C.  
 2000 Town Center  
 Suite 1659

Application granted. The deadline to file the balance of the pretrial submissions is extended to March 21, 2025. The pretrial conference scheduled for March 31, 2025 is adjourned to May 1, 2025 at 12:00 p.m.

SO ORDERED.



Philip M. Halpern  
 United States District Judge

Dated: White Plains, New York  
 February 27, 2025

Re: *Bucciero, et al. v. Amrock, LLC*  
 Civil Case No. 7:23-cv-4953

Dear Judge Halpern:

We represent Defendant Amrock, LLC. We write, jointly with Plaintiffs' counsel, to respectfully request a short extension on the Parties' joint submission of the revised Proposed Jury Instructions and Verdict Sheet, and an adjournment of the upcoming March 31, 2025 pre-trial conference.

With respect to the pre-trial submissions, the Parties are working collaboratively and continue to make progress on the revised submissions. The Parties have met and conferred virtually and in person, and intend on meeting in-person next week to resolve outstanding disputes. The Parties also attended a settlement conference before Judge Reznick on February 12, 2025, and although the matter has not been resolved, the Parties continue to engage in settlement negotiations and have made progress. The Parties believe that with the benefit of more time, they will be able to resolve most of remaining disputes and significantly narrow the issues that will likely require Court intervention. The Court granted an initial extension until January 24, 2025 to submit the above documents and subsequently granted the Parties' second request to submit these documents until February 28, 2025. The Parties are now seeking until March 21, 2025 to submit the above documents.

Additionally, the Court scheduled a pre-trial conference for March 31, 2025 at 12:00 p.m. *See* Dkt. No. 161. During the December 18, 2024 conference, I advised the Court that I am not available from March 30, 2025 until April 5, 2025, as I will be traveling. *See* Ex. A. Transcript of December 18, 2024 Conference, pp. 70:3-5. Accordingly, with Plaintiffs' counsel's consent, we respectfully request that the upcoming pre-trial conference be adjourned to April 11th, 17th or 22nd, or another date convenient for the Court.

We thank the Court for its understanding and attention to this matter.

Respectfully submitted,  
JACKSON LEWIS P.C.

*Allan Rubin*  
Allan S. Rubin

4925-1747-4080, v. 1

# EXHIBIT A

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 PATSY BUCCIERO, et al.,

4 Plaintiffs,

5 v.

23 CV 4953 (PMH)

6 CONFERENCE

7 AMROCK, LLC,

8 Defendant.

9  
10 United States Courthouse  
11 White Plains, N.Y.  
December 18, 2024

12  
13  
14 Before: THE HONORABLE PHILIP M. HALPERN, District Judge

15  
16  
17 APPEARANCES

18 WORKING SOLUTIONS  
19 Attorneys for Plaintiffs  
20 RACHEL M. HASKELL  
JESSICA CAHILL

21 JACKSON LEWIS, P.C.  
22 Attorneys for Defendant  
23 GREG RIOLO  
ALLAN S. RUBIN  
CASSANDRA FICANO

1 you how I conduct trials.

2 Anything else from you?

3 MR. RUBIN: Yes, your Honor. Just one thing.

4 March 30th to April 5th I have the same dilemma  
5 Mr. Riolo has.

6 THE COURT: What about these young ladies sitting  
7 behind the both of you? What's the problem?

8 MR. RUBIN: They're a lot younger.

9 MR. RIOLO: Everyone else in the courtroom is a lot  
10 younger than us.

11 THE COURT: I see.

12 MR. RIOLO: So we're definitely, you know.

13 MR. RUBIN: And I would just ask to protect that.

14 THE COURT: We'll write it down, we'll write it down.

15 MR. RUBIN: Thank you, your Honor.

16 MR. RIOLO: We'll figure it out.

17 THE COURT: Now, let me tell you how this goes. I'll  
18 do it very briefly.

19 I'm a stickler, have you noticed, on the joint  
20 pretrial order materials and things? And there's a reason for  
21 that. When I get done with it, I'm done. I've set the table.  
22 I'm done. I'm your trial judge. Okay? So here's how this  
23 goes.

24 On the day we start -- it will probably be a  
25 Monday -- we'll start at 9. We'll have morning business, us,